

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

2018 SEP 26 P 5:54
Grand Jury N-18-2

U.S. DISTRICT COURT
NEW HAVEN, CT

UNITED STATES OF AMERICA

Criminal No. 3:18CR

225 (VAR)

v.

VIOLATIONS:

MAYA LUISA FLORINA DESTEFFANO,
a.k.a. "Maya-Luisa Pastorelli" and "Maria,"

18 U.S.C. § 1349
(Conspiracy to Commit Bank Fraud)

18 U.S.C. § 1344
(Bank Fraud)

18 U.S.C. § 1028A(a)(1)
(Aggravated Identity Theft)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Commit Bank Fraud)

General Allegations

1. At all times relevant to this Indictment, People's United Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

2. Beginning on a date unknown, and continuing until in or about mid-June 2017, in the District of Connecticut and elsewhere, the defendants MAYA LUISA FLORINA DESTEFFANO, a.k.a. "Maya-Luisa Pastorelli" and "Maria" ("DESTEFFANO"),

and others known and unknown to the Grand Jury, planned and executed a scheme to defraud People's United Bank, a financial institution, by means

of materially false and fraudulent pretenses, representations and promises, by placing unauthorized devices known as skimming devices on People's United Bank automated teller machines ("ATMs") and on card swipe access devices used by People's United Bank to control access to ATM lobby doors. The conspirators, including DESTEFFANO, [REDACTED], and [REDACTED] and others known and unknown to the Grand Jury, clandestinely installed these devices for the purpose of capturing information encoded on the magnetic strips of bank debit cards that bank customers used at those ATMs and card swipe devices without the bank customers' knowledge. The information recorded by the skimming devices was information encoded on the magnetic strips, including information authorizing a customer to access his or her account.

3. It was further part of the scheme that the conspirators, including DESTEFFANO, [REDACTED], and [REDACTED] and others known and unknown to the Grand Jury, would surreptitiously place additional separate devices containing hidden pinhole cameras on the ATMs at times. The pinhole cameras allowed the conspirators to record the personal identification numbers ("PINs") used by bank customers to gain access to their accounts.

4. It was further part of the scheme that the conspirators, including DESTEFFANO, [REDACTED], and [REDACTED] and others known and unknown to the Grand Jury, later retrieved the skimming devices and pinhole cameras from the ATMs and swipe access devices. Members of the conspiracy then used the stolen information captured by these devices to create unauthorized access devices that functioned as bank cards. Those unauthorized access devices, in turn, were used along with the stolen PINs by members of the conspiracy, including DESTEFFANO, [REDACTED], and [REDACTED], and others known and unknown to the Grand Jury, to withdraw funds from the compromised bank accounts. As a result of these unauthorized withdrawals of funds from customer accounts, People's United Bank was required to credit the customers'

accounts for the money stolen from them.

Overt Acts

5. In furtherance of the conspiracy and to effect the objects of the conspiracy, the conspirators, including DESTEFFANO, [REDACTED] and [REDACTED] and others known and unknown to the Grand Jury, committed and caused to be committed the following overt acts, among others, in the District of Connecticut and elsewhere:

6. Between on or about February 18, 2017, and February 20, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 88 Ryder's Lane, Stratford, CT.

7. Between on or about February 25, 2017, and February 26, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 435 Main Street, Monroe, CT.

8. Between on or about March 1, 2017, and March 2, 2017, one or more members of the conspiracy conducted unauthorized ATM transactions in the District of Connecticut and elsewhere, using stolen bank account information.

9. Between on or about March 3, 2017, and March 5, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 435 Main Street, Monroe, CT.

10. On or about March 12, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 40 Quality Street, Trumbull, CT.

11. Between on or about March 18, 2017, and March 19, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located

at People's United Bank, 146 Sound Beach Avenue, Old Greenwich, CT.

12. On or about March 26, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 40 Quality Street, Trumbull, CT.

13. On or about March 29, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 1155 East Putnam Avenue, Riverside, CT.

14. Between on or about April 9, 2017, and April 12, 2017, one or more members of the conspiracy conducted unauthorized ATM transactions in the District of Connecticut and elsewhere, using stolen bank account information.

15. Between on or about May 27, 2017, and June 3, 2017, in the District of Connecticut, one or more members of the conspiracy used a skimming device at the ATM located at People's United Bank, 1940 Black Rock Turnpike, Fairfield, CT.

16. Between on or about June 4, 2017, and at least June 11, 2017, one or more members of the conspiracy conducted unauthorized ATM transactions in the District of Connecticut and elsewhere, using stolen bank account information.

17. Beginning on a date unknown and continuing until at least June 11, 2017, within the District of Connecticut and elsewhere, the defendants DESTEFFANO, [REDACTED] and [REDACTED], together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire to execute a scheme and artifice to defraud People's United Bank, a financial institution, by obtaining money, funds and credits owned by and under the custody and control of People's United Bank by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO through FOUR
(Bank Fraud)

18. The allegations contained in paragraphs 1-4 of Count One of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

19. On or about the dates listed for each count below, in the District of Connecticut and elsewhere, for the purpose of executing and attempting to execute the aforementioned scheme and artifice to defraud and to obtain money and property as described above, the defendants DESTEFFANO, [REDACTED], and others known and unknown to the Grand Jury, did knowingly and intentionally execute a scheme and artifice to defraud People's United Bank, a financial institution, to obtain money, funds, and credits owned by and under the custody and control of such financial institution by means of materially false and fraudulent pretenses, representations and promises.

Count	Date (on or about)	Financial Institution
2	March 1-2, 2017	People's United Bank
3	April 9-12, 2017	People's United Bank
4	June 4-11, 2017	People's United Bank

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FIVE
(Aggravated Identity Theft)

20. The allegations in paragraphs 1-4 of Count One of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

21. On or about March 2, 2017, in the District of Connecticut, the defendant

DESTEFFANO did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a violation of Title 18, United States Code, Section 1349, namely, the defendant DESTEFFANO transferred, possessed, and used, without lawful authority, an access device containing bank account information and the PIN of customer K.W., whose bank card ending in account number -8343 was passed through an ATM skimming device placed on or near an ATM in connection with a conspiracy to commit bank fraud, as described above in paragraphs 1-4.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT SIX
(Aggravated Identity Theft)

22. The allegations in paragraphs 1-4 of Count One of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

23. On or about April 11, 2017, in the District of Connecticut, the defendant [REDACTED] did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a violation of Title 18, United States Code, Section 1349, namely, the defendant [REDACTED] transferred, possessed, and attempted to use, without lawful authority, an access device containing bank account information and the PIN of customer G.L.B, whose bank card ending in account number -1045 was passed through an ATM skimming device placed on or near an ATM in connection with a conspiracy to commit bank fraud, as described above in paragraphs 1-4.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT SEVEN
(Aggravated Identity Theft)

24. The allegations in paragraphs 1-4 of Count One of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

25. On or about April 11, 2017, in the District of Connecticut, the defendant [REDACTED] did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a violation of Title 18, United States Code, Section 1349, namely, the defendant [REDACTED] transferred, possessed, and used, without lawful authority, an access device containing bank account information and the PIN of customer B.U.R., whose bank card ending in account number -8433 was passed through an ATM skimming device placed on or near an ATM in connection with a conspiracy to commit bank fraud, as described above in paragraphs 1-4.

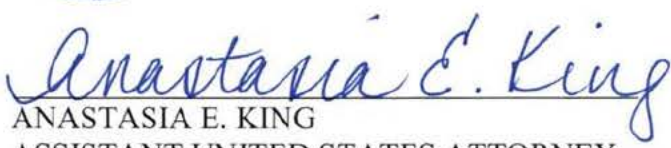
All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL


FOREPERSON

UNITED STATES OF AMERICA


JOHN H. DURHAM
UNITED STATES ATTORNEY


ANASTASIA E. KING
ASSISTANT UNITED STATES ATTORNEY